

Appln. Serial No. 10/715,960
Amendment Dated February 21, 2007
Reply to Office Action Mailed November 22, 2006

REMARKS

In the Office Action dated November 22, 2006, claims 1, 2, 17, 35, and 36 were rejected under 35 U.S.C. § 102 over U.S. Patent Application Publication No. 2002/0083098 (Nakamura); claims 32-34 were rejected under § 102 over U.S. Patent Application Publication No. 2005/0138215 (Tjong); and claims 3-16 and 18-31 were rejected under § 103 over Nakamura in view of Tjong.

Independent claim 1 has been amended to recite subject matter of former dependent claim 10 (now cancelled). As amended, claim 1 recites a method of remotely accessing a computer system by a remote console that comprises receiving, by an emulation device that emulates a Universal Serial Bus (USB) human interface device, first pointer position data representing a position of a first pointing device coupled to the remote console, where the emulated USB human interface device represents a second pointing device that is of a different type than the first pointing device. The first pointer position data is received over a network by the emulation device from the remote console. The method of claim 1 further includes generating, by the emulation device that emulates the USB human interface device, second pointer position data representing a position of the second pointing device based on the received first pointer position data.

The subject matter of claim 1 was rejected by the Office Action as being obvious over Nakamura and Tjong. It is respectfully submitted that a *prima facie* case of obviousness has not been established with respect to Nakamura and Tjong for at least the following reasons: (1) no motivation or suggestion existed to combine the reference teachings; and (2) the hypothetical combination of the references does not teach or suggest all elements of claim 1. *See* M.P.E.P. § 2143 (8th ed., Rev. 5), at 2100-126.

Point (2) is discussed first. Several points of error were made in the Office Action in rejecting the claimed subject matter over Nakamura and Tjong. The first point of error is the erroneous application of Nakamura to the elements of claim 1. The Office Action incorrectly identified element 320 in Fig. 8 of Nakamura as being the emulation device recited in claim 1. 11/22/2006 Office Action at 2. Element 320 in Nakamura is a collaboration applet that executes in terminal devices 11, 12 (shown in Fig. 2 of Nakamura). Nakamura describes a collaboration technique for synchronizing locations of remote pointers in windows of web browsers, regardless

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of the type or the setup of the web browsers. Nakamura, ¶ [0012]. The collaboration applet 320 cited by the Office Action is downloaded to the terminals at the time of execution to allow the synchronization to be performed. *Id.*, ¶ [0013]. The synchronization technique that is performed by the collaboration applets 320 in the terminal devices 11, 12 of Nakamura is based on the use of markers in web pages that are displayed in the terminal devices. *Id.* ¶ [0069], [0079]-[0084], [0095]. As taught by Nakamura, a marker selector 805 in the collaboration applet selects a marker that is to be used as a reference for remote pointer synchronization. *Id.*, ¶ [0095]. In an example given in Nakamura, the terminal device 12 was considered a transmission side terminal device, and the terminal device 11 was considered a reception side terminal device. *Id.*, ¶ [0102]. The collaboration applet 320 in the transmission side terminal device 12 selects a marker object as a synchronization reference, and transmits identification information (referring to the marker object) to the reception side terminal device 11. *Id.* The reception side terminal device 11 then identifies a marker object based on the identification information received from the transmission side terminal device 12, and performs synchronization control based on the location of the marker object. *Id.*

The synchronization of remote pointers based on locations of markers and web pages, as performed in Nakamura, does not constitute the tasks performed by the emulation device recited in claim 1. There is no component in the collaboration applet 320 of Nakamura that performs any *emulation* in the manner recited in claim 1. All the collaboration applet 320 of Nakamura performs is identifying a marker object within a web page, and using the location of that marker object to control the display location of a remote pointer. Nakamura, ¶ [0101].

The Office Action argued that "collaboration" as taught by Nakamura "is equivalent to remotely accessing a computer system by a remote console and the teachings of Nakamura comprise the limitations recited in claim 1." 11/22/2006 Office Action 16. The Office Action stated that Nakamura teaches that "terminal B to emulate terminal A, since terminal B is synchronized to terminal A, and terminal B performs the same pointer movements and functions as terminal A." *Id.*

However, the Office Action has not addressed the fact that the synchronization technique performed by the collaboration applets 320 in the terminal devices 11, 12 of Nakamura is based on use of markers and web pages that are displayed in the terminal devices. There is no teaching

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Nakamura of an emulation device that receives a first pointer position data representing a position of a first pointing device coupled to the remote console, where the emulation device is to emulate a second pointing device that is of a different type than the first pointing device, and the emulation device further generating second pointer position data representing a position of the second pointing device based on the received first pointer position data.

For at least the reason that the Office Action has improperly applied Nakamura to the claim elements, the obviousness rejection of the subject matter of claim 10 over Nakamura and Tjong is defective.

Moreover, with respect to the subject matter of claim 1, the Office Action conceded that Nakamura fails to disclose that the emulation device emulates a USB human interface device. 11/22/2006 Office Action at 8. Note that the emulated USB human interface device of claim 1 represents the second pointing device that is of a different type than the first pointing device. However, the Office Action cited Tjong as disclosing that "a USB connection is used for interfacing for point-to-point communication ([0061])." *Id.*

Although Tjong describes point-to-point data communications between a host computing device and a client device (including point-to-point communication over a point-to-point USB connection), there is absolutely no mention or suggestion anywhere in Tjong of an emulation device that emulates a USB human interface device, where the USB human interface device represents a second pointing device that is of a different type than the first pointing device. Nor does Tjong provide any suggestion that the emulation device that emulates the USB human interface device generates second pointer position data representing a position of the second pointing device based on the received first pointer position data.

Thus, it is respectfully submitted that the hypothetical combination of Nakamura and Tjong would not teach or suggest all elements of claim 1. This is a further point of error made by the Office Action.

Furthermore, there existed no motivation to incorporate the teachings of Tjong into Nakamura to achieve the claimed invention. As conceded by the Office Action, Nakamura clearly fails to teach or even hint at an emulation device that emulates a USB human interface device. There is no suggestion by Tjong of modifying the teachings of Nakamura to incorporate such an emulated USB human interface device. All that a person would have been taught by

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Tjong is that a point-to-point USB connection can be used to perform point-to-point communication between a host computing device and a client device. However, this point-to-point USB connection, as taught by Tjong, provides no suggestion to modify Nakamura to incorporate an emulation device to emulate a USB human interface device that performs the tasks recited in claim 1. Therefore, a person of ordinary skill in the art clearly would not have been motivated to combine the teachings of Nakamura and Tjong to achieve the claimed subject matter.

In view of the foregoing, it is respectfully submitted that a *prima facie* case of obviousness has not been established with respect to claim 1.

Independent claim 17 is similarly allowable over Nakamura and Tjong. Claim 17 recites an interface to receive first pointer position data from a remote console over a network, where the first pointer position data is associated with a first pointing device. Claim 17 further recites a controller to emulate a USB human interface device that represents a second pointing device that is of a different type from the first pointing device. The controller generates second pointer position data in response to first pointer position data. As discussed above, the hypothetical combination of Nakamura and Tjong clearly fails to disclose or suggest a controller that emulates a USB human interface device that represents a second pointing device that is of a different type from the first pointing device. Moreover, as discussed above, no motivation or suggestion existed to combine the teachings of Nakamura and Tjong.

Independent claim 35 is also allowable over Nakamura and Tjong since claim 35 recites means for emulating a *USB tablet device* that is different from a mouse device.

Independent claim 32 was rejected as being anticipated by Tjong. Claim 32 has been amended to recite the subject matter of claim 33 (now cancelled). Moreover, claim 32 has been amended to recite that the controller transforms relative pointer position data from a first pointing device to an intermediate pointer position data, and to further transform the intermediate pointer position data to the absolute pointer position data based on *characteristics of a USB tablet device being emulated by an emulation device coupled to the computer system*. Tjong clearly fails to disclose the recited subject matter. Therefore, claim 32 is not anticipated by Tjong.

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Dependent claims are allowable for at least the same reasons as corresponding independent claims.

Allowance of all claims is respectfully requested. The Commissioner is authorized to charge any additional fees and/or credit any overpayment to Deposit Account No. 08-2025 (200210195-1).

Respectfully submitted,

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